

03 19 2015

Cancellation No.: 92060328 - 79 070 322

MADAM MARY CATHERINE FAINT

Interlocutory Attorney

Dear Madam,

I would like to send as follow.

If you could handle accordingly, I am happy.

Attached: DEFENDANT'S RESPONSE 29 pages
Certificate of Service 1 page

Sincerely yours,

N. Minaki

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.)

Representative Director

Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

TEL 81-45-333-4525 81-45-332-7890 direct

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03-19-2015

U.S. Patent & TMO/c/TM Mail Rpt Ct. #22

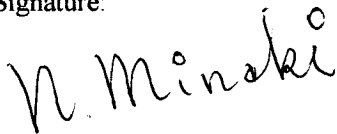
Certificate of Service

I hereby certify that a true and complete copy of the foregoing document, DEFENDANT' RESPONSE, as enclosed have been served on MR. MILORD A. KESHISHIAN MILORD & ASSOCIATES, PC by mailing said copy on March 19, 2015 via First Class Mail, EMS, postage prepaid to: MR. MILORD A. KESHISHIAN MILORD & ASSOCIATES, PC 2049 CENTURY PARK EAST, SUITE 3850 LOS ANGELES, CA 90067, UNITED STATES.

Enclosed: DEFENDANT' RESPONSE 29 pages

Date: March 19, 2015

Signature:

A handwritten signature in black ink that reads "N. Minaki". The signature is written in a cursive, flowing style.

Nobuhiko Minaki

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki

Representative Director

Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

Tel 81-45-333-4525 81-45-332-7890 direct

Fax 81-45-515-0047 mina-csj@nifry.com

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Plaintiff Trademark: LOVE IS FOREVER
Serial Number: 86285762
Filing Date: May 19, 2014
Refusal Issue/Mailing Date: August 27, 2014

Defendant Trademark: LOVE IS FOREVER ®
Registration No.: 3811074
Filing Date: May 13, 2009
Registration Date: June 29, 2010
Trademark Creator, Owner, User

Plaintiff	L.A.Gem and Jewelry Design, Inc.
Assigned Attorney	MR. MILORD A. KESHISHIAN
	Cancellation No.: 92060328
Defendant	Souki Manufacturing Inc.
No Assigned Attorney	Nobuhiko Minaki (Mr.)
	Representative Director
	Trademark Creator, Owner, User

March 19, 2015

Ref number: Souki 150303

**DEFENDANT'S RESPONSE
to/for
PETITIONER'S MOTION TO STRIKE RESPONDENT'S ANSWER
AND AMENDED ANSWER**

Due to this MOTION TO STRIKE and PETITION TO CANCEL, 92060328, seem to be based on INJUSTICE, I feel hypothetically, I would like to sincerely recommend for plaintiff to withdraw this MOTION TO STRIKE including PETITION TO CANCEL, 92060328.

And I would like to report/respond and deny regarding the MOTION TO STRIKE etc as

follows.

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NB 1. ~ 14.:

1. Brief prosecution history:

- 05/19/2014: Same trademark to my trademark, LOVE IS FOREVER, was applied by plaintiff.
- 08/27/2014: Plaintiff application was refused.  
**I think, this refusal is a purely consequent matter because Mr. Milord A. Keshishian is an attorney, a pro, regarding trademark matter.**
- 11/05/2014: Petition to cancel LOVE IS FOREVER ® was applied by plaintiff .
- 02/13/2015: I filed the ANSWER, receiving high kindness of many people of TRADEMARK TRIAL APPEAL BOARD, receiving extension of time to ANSWER, I filed my ANSWER.
- 03/05/2015: This MOTION TO STRIKE was raised by PLAINTIFF.
- 03/19/2015: This RESPONSE of Defendant is to be mailed by post for TRADEMARK TRIAL APPEAL BOARD.

2. Regarding the style/manner of sentence of my ANSWER:

Regarding the style/manner of sentence of my ANSWER presented/mailed 02/13/2015 for TTAB and Amendments presented/mailed 03/03/2015 for TTAB, I requesting respectfully/sincerely advice of TM information specialist of 571-272-8500 of TTAB, I received the words, No Problem, and I have been relieved now.

3. Character of this REPORT/RESPONSE for/to the PLAINTIFF'S MOTION TO STRIKE:

This REPORT/RESPONSE is prepared according to the following conditions etc.

- 1) Fundamentally, according to laws, history/facts, unwritten laws, Common Sense, Public Order and Morals, First Come First Served Rule etc, including criminal law etc, I would like to sincerely report/respond including for/to this PLAINTIFF'S MOTION TO STRIKE dated March 05, 2015 as follows.
- 2) Defendant has been encountered the 2 PETITION TO CANCEL cases. The one

is this 92060328 filed 11/05/2014 and the other is 92058656 filed 02/07/2014. The grounds of the 2 PETITION TO CANCEL are ABANDONMENT of my registered trademark, LOVE IS FOREVER ®.

Due to the contents/purposes of the 2 petitions and the grounds of 2 petitions are same, CANCELLATION and ABANDONMENT, the contents of the 2 ANSWERS are almost same.

- 3) For TRADEMARK TRIAL AND APPEAL BOARD defendant reported/submitted the 2 ANSWERS as follows.

ANSWER for 92058656 on 03/23/2014 by registered airmail and the complete version of amendment was submitted by registered airmail 12/30/2014 according to the order.

ANSWER for this 92060328 on 02/13/2015 by registered airmail and the amendments was submitted on/through Internet, ESTTA 03/03/2015.

- 4) And the 2 contents are prepared according to truths and facts which are almost same each other, and proved by **the defendant pretrial disclosures for 92058656 with 27 Evidences etc** mailed 01/26/2015 for TTAB.
- 5) And defendant/I have never abandoned and will never abandon the mark as explained/reported in the Complete Version of Amended ANSWER for 92058656 including the defendant pretrial disclosures with 27 Evidences etc for 92058656 and as being reported/responded in this REPORT/RESPONSE as follows.

4. Meaning of Time to Answer, 3/19/2015 etc:

Regarding meaning of time to answer, making telephone call to 571-272-8500 more than once, I received highly kind and reliable advice of TM Information Specialists of United States Patent and Trademark Office. The advice is that time to answer means that on or before the date I handed to a post office in Japan. So I will hand/present my ANSWER for United States Patent and Trademark Office on or before March 19, 2015 to a post office in Japan.

5. USA, USPTO:

Herein after USA will be used for United States of America and USPTO will be used for United States Patent and Trademark Office.

6. Mailing:

I will send by registered air mail including to plaintiff.

7. Certificate of Mailing etc:

In this ANSWER/RESPONSE, I will attach or mail separately one page of the Certificate of Service, which I will prepare.

8. Usage of I MY ME etc:

I will use for defendant the word, defendant, and will use the words, I MY ME or WE OUR US for defendant.

9. Evidences:

Regarding proofs, evidences etc of my assertions etc, I would like to omit in this REPORT/RESPONSE.

10. Regarding using ® as LOVE IS FOREVER ® as in the above etc:

Regarding using ® as LOVE IS FOREVER ® as in the above etc, I had started to use it according to the so highly kind advice of a highly respectful attorney of USA. His advice was given to me at a place in a sightseeing place of the vicinity of Yokohama Japan and it was of on a day of a weekend or on a holiday of 2010 or so.

After applying for the mark to Japan Patent Office July 1, 2008, for class 14, it was registered May 15, 2009. Being registered by WIPO, World Intellectual Property Organization, May 13, 2009, on the same day application to USPTO was done and registered June 29, 2010. And the highly kind advice of the attorney was given to me at the sightseeing place 2010 or so.

I had started intercept survey by myself regarding LOVE IS FOREVER ® etc from 2008, and from 2009 at the sightseeing place almost every Saturday and Sunday, and holiday if possible. My survey being of a short time one of 1 minute or so with 1 or a few questions without asking individual information as personal name etc of answerer. Answerers are welcome for the short time one but unwelcome for the long one. So, I have to do almost every weekend or so in order to ask various kinds of questions. 50 to more than 100 answerers or so a day. At the early stage as 2009,

2010 around the number a day was small, but through experience becoming skilled, it has become many as 50 to 100 answerers a day etc, and in the summer season the number will be bigger than in cold winter season.

But I have been **obstructed** to do the survey including the start of production of my products, preparation of Internet shop etc from around the end of February of 2014 due to the petition to cancel case, 92058656, and in addition by this case 92060328.

A result of the survey from December 2009 to 2010 Spring showed no ® mark, **LOVE IS FOREVER**, was more acceptable than with ® mark, **LOVE IS FOREVER ®**. With ® mark 275(female 154 male 121) 44.6%, no ® mark 342(female 188 male 154) 55.4%.

So my mind had been made up for using no ® mark, **LOVE IS FOREVER**.

On or around one of the days at the place, I met the attorney.

Receiving OK of him for my survey, starting conversation, he advised me to attach ® mark **firmly with friend like attitude** confirming my eyes if they showing positive understanding or not.

Noticing my eyes were not positive to attach ® mark, he said he was an attorney and he seemed to want to say, "My words are of truth and reliable because I am an attorney."

His attitude and words gave me the strong impact to my mind that had been tended for no ® mark.

Nodding of a Japanese lady made the impact firm. The nodding was of a modest lady of business lady atmosphere, and I recognized she had escorted him to the place for his job, not for sightseeing.

I have felt she looked like an employee of the Japanese branch or so of a well-established famous etc company of USA, of which USA headquarters asked him to visit Japan to investigate regarding **LOVE IS FOREVER ®** or so.

His and her high attitude, way of talking, and atmosphere had made

me feel in this way. They were friendly, calm and composed.

According to his so highly kind advice, having started to study regarding ® mark, I decide to attach ® mark as **LOVE IS FOREVER ®**.

Regarding their names etc I do not know due to my survey being of 1 minute or so with 1 or a few questions not asking individual information as personal name etc of answerer.

The highly thankful matter regarding the attorney and the lady is to remain in and beyond my memory.

11. Regarding Certificate of Mailing and Certificate of Service:

In my ANSWER dated and mailed from Japan March 23, 2014 for TTAB, I have used the word, **Mailing**, as Certificate of Mailing.

I would like to keep it as it is due to the word was given by a highly kind lady of TTAB when I made a telephone call for advice for preparing my ANSWER.

Regarding the word, **Service**, as Certificate of Service I have been using since May 03, 2014 according to the words of another highly kind lady of TTAB, and I would like to keep it as it is.

12. Lack of respect for fame and dignity of people:

I think hypothetically that there seems no sign/tint in the attorney and the plaintiff having considered the importance of the fame and dignity of people. If this sort of consideration was done in 92058656 and 92060328, the 2 cases have not happened, I think.

That is, regarding 2 cases, it seems that the people of the plaintiffs have no consideration for importance of Common Sense and Public Order and Morals, First Come First Served Rule etc and seem to abuse the trademark law etc, I feel hypothetically.

I do not know which side is the seller and/or buyer in this petition to cancel case and I do not know what kind of business discussions have been done or going on between the assigned attorney and the plaintiff.



I think the attorney has a big possibility to become the seller hypothetically. Finding/confirming my trademark on data base of USPTO etc, he proposing to the plaintiff saying "Hello, Sir, how do you feel about this brand, LOVE IS FOREVER ®, interesting?" "Oh wonderful. Who has it?" "*If you want, I can prepare to sell it for you. But it is not cheap.*" "How much?" "*US\$○△○□○○○. – by cash.*" "All right, I will buy it." "*Then I will arrange it next year or so. OK?*" "!!?? It is a quite a long time to wait. Why it takes such a long time?" "Because ... my and/or your petition to cancel the registration of the mark may, upon payment of the prescribed fee, be filed ... I and you have been damaged and will continue to be damaged if/because the continued existence of such improper Registration stands as a bar to ... and casts a cloud upon our right to enjoy the free and exclusive use thereof in connection with the sale of its goods...." "I have understood. I will wait for a good news from you...."

This conversation/transaction is a hypothetical one of course. But no one can deny the possibility of the happening of this kind of business transaction, hypothetically, I think.

Selling and buying goods of other/stranger/3rd party without reporting/having the consent of other/stranger/3rd party is no good, which even an infant knows I think. But it might be that the persons related to these cases forgetting etc the unwritten law, Common Sense, Public Order and Morals, First Come First Served Rule etc, they have been abusing etc of the law, § 14(15U.S.C. § 1064), I feel hypothetically.

If 100 or more this kind of things happened to a person or an organization, people might say it is a 'disaster' I feel. To do one crime is a crime, I feel. A selling and buying goods of other/stranger/3rd party without reporting/having the consent of other/stranger/3rd party is no good. 100 sellings and buyings of goods of others/strangers/3rd parties without reporting/having the consents of others/strangers/3rd parties are no good.

### 13. Defendant being in Wretched Situation, A Good Chance for Plaintiffs ? :

Defendant/I have been in the wretched situation as attacked by the plaintiff of another case, 92058656. Altogether defendant/I will be or have been attacked by 2

cases, which will be a good chance to the plaintiff of 92060328?

14. Fascination of LOVE IS FOREVER ® :

**LOVE IS FOREVER ® has fascination.**

So, sometimes it makes people lose power of proper/sane judgment in mind and to be mad and/or insane.

And this case, 92060328, might be a case invited by the power of the trademark fascination to make people mad and/or insane, hypothetically I feel.

For people who run accessory items business such as engage rings, earrings, bracelets, necklaces, or the like etc, this brand, **LOVE IS FOREVER ®** is too fascinating, I feel. And in rare cases some people who run such business might lose the power to control and be mad and insane in front of the brand, hypothetically I feel.

~ NB 14.

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RESPONSE

to/for

Plaintiff assertion 1 ~ 8

I would like to deny the assertion of plaintiff's/PETITIONER'S MOTION TO STRIKE dated March 05, 2015, etc.

Style/manner of expression of ANSWER etc of 92060328 including/since around Defendant Pretrial Disclosures of 92058656 dated January 26, 2015, I am afraid, it has become overstating etc, due to being influenced, in order to defense myself from the many/detail Discovery Requests by plaintiff of 92058656 dated September 24, 2014, my ANSWER for the Petition for Cancellation of 92060328, RESPONSE for this MOTION TO STRIKE of 92060328 might be overstating/stating too much etc, but which is for self defense etc, which is not my method, if which is kindly understood, I am highly happy.

And if being allowed, making/dividing the plaintiff assertion into 8 portions, **Plaintiff assertion 1 ~ 8**, I would like to respond/deny as follows.

**PETITIONER'S MOTION TO STRIKE RESPONDENT'S ANSWER
AND AMENDED ANSWER**

Commissioner for Trademarks
BOX TTAB
P.O.Box 1451
Arlington, VA 22313-1451

Plaintiff assertion 1/8(portions):

Pursuant to Rule 12(f) of the Federal Rules of Civil Procedure and Section 506.01 of the TBMP, L.A. GEM & JEWELRY DESIGN INC. (“LA Gem” or “Petitioner”) hereby moves the Trademark Trial and Appeal Board(the “Board”) for an order striking the purported answers filed by SOUKI MANUFACTURING, INC.(“SOUKI” or “Respondent”), on the ground that the purported answers consist entirely of immaterial matter that fail to conform to requirements of Rule 8(b) of the Federal Rules of Civil Procedure.

Plaintiff assertion 2/8:

This motion is based upon the attached brief, the Petition for Cancellation filed by Petitioner on November 5, 2014 (Dkt. No. 1), Respondent's purported answer and amended answer, filed on February 19, 2015 (Dkt. No. 9) and March 3, 2015 (Dkt. No. 10), respectively, and such other argument and evidence as may be presented to the Board on this motion.

Plaintiff assertion 3/8:

I. ARGUMENT

On November 14, 2014, Petitioner filed its Petition for Cancellation of the LOVE IS FOREVER registration for “key rings of precious metal; ornaments, namely, earrings, precious metal insignias, precious metal badges, precious meta medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links; clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks” in International Class 14. Petitioner's claim for relief, in 12 numbered paragraphs, is based upon Registrant's failure to use the LOVE IS FOREVER mark in commerce, or that it completely ceased use of the mark, in connection with goods identified in the Registration for a period of at least 3 consecutive years. Further, Petitioner has been damaged and will continue to be damaged if the Registered Mark is permitted to remain on the Principal Register because the Registered Mark stand as a bar to Petitioner's ability to

federally register and protect its LOVE IS FOREVER mark for its jewelry goods. *See* Petition for Cancellation, Dkt. No. 1.

Plaintiff assertion 4/8:

On February 13, 2015, Respondent, appearing pro se, served an untitled document by mail that purports to be an “Answer.” On March 3, 2015, Respondent electronically filed an Amended Answer. These documents are “answers” in name only because they do not permit Petitioner to determine which of its allegations are admitted or denied, or what claims are at issue. For the reasons set forth below, the purported answers should be stricken and Applicant should be required to file an answer that conforms to the requirements of the Federal Rules of Civil Procedure.

Plaintiff assertion 5/8:

A. APPLICANT'S PURPORTED ANSWERS SHOULD BE STRICKEN

Rule 8(b) of the Federal Rules of Civil Procedure provides in pertinent part as follows:

“A party shall state in short and plain terms the party's defenses to each claim asserted and shall admit or deny the averments upon which the adverse party relies. If a party is without knowledge or information sufficient to form a belief as to the truth of an averment, the party shall so state and this has the effect of a denial. Denials shall fairly meet the substance of the averments denied. When a pleader intends in good faith to deny only a part or a qualification of an averment, the pleader shall specify so much of it as is true and material and shall deny only the remainder.”

Plaintiff assertion 6/8:

Fed. R. Civ. P. 8(b).

Under Rule 8(b), an applicant's answer must be directly responsive to the Petition for Cancellation; it should not merely contain arguments in the nature of a brief. *See Thrifty Corporation v. Bomax Enterprises*, 228 USPQ 62,63(TTAB 1985)(requiring Applicant to refile its answer to Opposer's notice of opposition because Applicant's filing lacked a specific response to each averment in the notice of opposition and was “basically argumentative rather than a proper responsive pleading to the notice of opposition”). The Respondent clearly did not meet this standard because as each paragraph of the “Answer” contains bare and conclusory assertion or arguments. Further, the “Answer ” does not contain specific responses to each of the averments in Opposer's Petition for Cancellation, but instead contains a confusing recitation

of events that may or may not have occurred and “hypothetical” argument of “obstruction of business” in an attempt to convince the Board why the registration should not be cancelled. These bald assertions do not provide Petitioner or the Board with fair notice of whether Respondent admits or denies the allegations, nor and does not plead the elements necessary to establish the affirmative defenses. As such, these assertions and “defenses” are not properly pleaded as an answer and affirmative defenses, not sufficiently founded on rules or case law, and should be stricken.

Plaintiff assertion 7/8:

A respondent is allowed to amend its answer once as a matter of course within twenty-one days after serving it. Fed. R. Civ. P. 15(a); TBMP § 507. Respondent's March 3, 2015 amended “Answer” is incomplete because it did not include a single, complete version of the intended amended answer. Instead, Respondent amended and served only amended pages 1, 7, 16, 29, and 34 of the original “answer.” Since Respondent's March 3, 2015 amended “Answer” is incomplete, it should be stricken.

Plaintiff assertion 8/8:

As set forth above, Respondent's purported answer is ambiguous, unintelligible, uncertain, legally insufficient and/or improper. Therefore, it is appropriate for it to be stricken, prior to the parties expending their time, and the Board's time, on unnecessary discovery, testimony, argument and briefing. Applicant should be ordered to file an answer that is in proper form and conforms to the requirements of Rule 8(b), and that is properly served upon Petitioner's counsel.

Dated: March 5, 2015

Respectfully submitted,

MILORD & ASSOCIATES, PC

/Milord A. Keshishian/

Milord A. Keshishian, Esq.

Attorneys for Petitioner

L.A. GEM AND JEWELRY DESIGN, INC.

2049 Century Park East, Suite 3850

Los Angeles, CA 90067

Telephone: (310) 226-7878

Facsimile: (310) 226-7879

Regarding the following **Plaintiff assertion 1 ~ 8**, although they seem to mention how to write, such as style of sentence etc mainly, not mentioning the merits/issues adequately of this case and not showing evidences etc regarding this, 92060328, I would like to respond to deny as follows.

Plaintiff assertion 1:

Pursuant to Rule 12(f) of the Federal Rules of Civil Procedure and Section 506.01 of the TBMP, L.A.GEM & JEWELRY DESIGN INC. (“LA Gem” or Petitioner) hereby moves the Trademark Trial and Appeal Board (the “Board”) for an order striking the purported answers filed by SOUKI MANUFACTURING, INC. (“SOUKI” or “Respondent”), on the ground that the purported answers consist entirely of immaterial matter that fail to conform to the requirements of Rule 8(b) of the Federal Rules of Civil Procedure.

Response 1 for the above Plaintiff assertion 1:

Defendant/I will deny the above Plaintiff assertion 1 as follows.

Defendant/I am happy to be in accordance with **JUSTICE, FACTS/TRUTH**, etc, and defendant/I am to be happy if customers are to be happy/satisfied with its/my products with the registered trademark, LOVE IS FOREVER ®.

The above Plaintiff assertion 1 including the following assertions as 2 to 8 etc will never provide the reasons etc that the Plaintiff is OK to do things/matters against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc.

Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, I think hypothetically.

If so, if this MOTION TO STRIKE including PETITION TO CANCEL, 92060328, to be withdrawn or disregarded, I am happy.

Grounds of this Petition for Cancellation is Abandonment.

But I have never abandoned my registered trademark, LOVE IS FOREVER ® and I will never abandon.

Defendant/registrant/I have been continuing to prepare the business of the defendant step by step as a tortoise although being encountering INJUSTICE as the OBSTRUCTION OF BUSINESS, MOTION TO STRIKE etc done by you, Mr. Milord A. Keshishian, the assigned attorney for the plaintiff, which I will mention hypothetically.

So the motive of Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be based on INJUSTICE, I feel hypothetically.

That is, the plaintiff seems to be happy to obtain a seat in a train/theater/restaurant etc which has been used by a firstcomer, or obtain right of ownership of goods or the trademark without consent of the owner etc, I feel hypothetically.

I will use Internet shop to sell the products with the registered trademark, LOVE IS FOREVER ®. And I have been starting to do marketing research regarding the image of the trademark, LOVE IS FOREVER, November 23 and 24, 2008 firstly.

And since then continuing to prepare the products with the trademark, LOVE IS FOREVER ®, although I have been continuously OBSTRUCTED the preparation around/since 2012 or so by the unwelcome homepages mainly of legal offices, which, it seems, visiting the data base of USPTO, noticing and using my registered trademark, LOVE IS FOREVER ® etc without my OK for, it seems, their office advertisement.

And now OBSTRUCTION by the petition to cancel the registered trademark, LOVE IS FOREVER ®, 92058656, since February 07, 2014, including this petition to cancel the registered trademark, LOVE IS FOREVER ®, 92060328, since November 05, 2014, etc.

If the issues/merits of this case are abusing laws, legal system etc by the assigned attorney for plaintiff hypothetically, and the assigned attorney having been happy to obtain right of ownership of the registered trademark, LOVE IS FOREVER ®, without consent of the owner etc, the above **Plaintiff assertion 1** seem to be irrelevant to the issues/merits of this case too.

Mentioning irrelevant things, to kill time for business etc of defendant is to be **OBSTRUCTION OF BUSINESS** to defendant, which is a sort of **INJUSTICE**, I feel hypothetically.

If such kind of **INJUSTICE** being pastured and if becoming **full of INJUSTICE**, it will be promoting the destruction of prosperity/tranquility/welfare/freedom/liberty/unity etc of this society, I feel.

Getting rid of or pushing aside the firstcomer, registrant/defendant, from the seat the firstcomer has sat/used, he, the assigned attorney for plaintiff, seems to be happy to push aside the firstcomer in order to occupy/obtain the seat, I feel hypothetically.

I have been only one work force in defendant since its foundation, February 05, 2008, so I have been doing every thing by myself such as the preparation for the products with **LOVE IS FOREVER ®** and etc etc.

And now this 92060328 from November 05, 2014 and 92058656 from February 07, 2014, having been filed by the two plaintiffs, my preparation of the products has been delayed and delayed, which no one will say **JUSTICE**, no one will say **PROMOTION OF BUSINESS**, I think.

And the assigned attorney, is happily trying to obtain the trademark, pushing aside the firstcomer, the registrant, from the one seat, I feel hypothetically. That is, the plaintiff has been doing **OBSTRUCTION OF BUSINESS, INJUSTICE** to/against defendant, I feel hypothetically.

But actually defendant is **OBSTRUCTED** encountering **INJUSTICE**, and I have been coping with the **PETITION TO CANCEL, MOTION TO STRIKE** receiving highly thankful advice of so many respectful people.

Mr. Milord A. Keshishian, if you love **JUSTICE** and hate **INJUSTICE** and if you could kindly/respectfully refrain from doing **OBSTRUCTION OF BUSINESS, INJUSTICE** to defendant, I am highly/respectfully thankful.

If you do not refrain from doing **OBSTRUCTION OF BUSINESS, INJUSTICE** to defendant, that is, if you do not withdrawing this cancellation petition, 92060328, including this **MOTION TO STRIKE**, people will say you love to do **INJUSTICE**, I think hypothetically.

In order to obtain the one seat/trademark registered for the firstcomer, defendant/registrant, abusing the **TRADEMARK LAW, Federal Rules of Civil Procedure Rule 12(f)** etc should

be refrained, I think.

This is another issue/merits of this case, I feel.

For selling and buying goods/property, for movement of right of ownership of goods/property without consent of the owner, we should not abuse/use the TRADEMARK LAW, CANCELLATION SYSTEM, MOTION TO STRIKE SYSTEM, etc I feel.

To obtain things etc of others/strangers/3rd parties without reporting/having the consent of others/strangers/3rd parties is no good and should be refrained, which even an INFANT knows. **And an INFANT will angry if you, Mr. Milord A. Keshishian, taking away a cookie the INFANT is going to eat, I think.**

Or how do you respond if someone will do same sort of thing to you?

Plaintiff assertion 2:

This motion is based upon the attached brief, the Petition for Cancellation filed by Petitioner on November 5, 2014 (Dkt. No. 1), Respondent's purported answer and amended answer, filed on February 19, 2015 (Dkt. No. 9) and March 3, 2015 (Dkt. No.10), respectively, and such other argument and evidence as may be presented to the Board on this motion.

Response 2 for the above Plaintiff assertion 2:

Defendant/I will mention regarding the above Plaintiff assertion 2 as follows.

The above Plaintiff assertion 2 including the above Plaintiff assertion 1 and the following assertions as 3 to 8 etc will never provide the reasons etc that the Plaintiff is OK to do things/matters against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, I think.

Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, which we should/must not do, I think hypothetically.

If so, if this MOTION TO STRIKE including PETITION TO CANCEL, 92060328, to be withdrawn or disregarded, I am happy.

Defendant/I am happy to be in accordance with JUSTICE, FACTS/TRUTH, etc, and

defendant/I am to be happy if customers are to be happy/satisfied with its/my products with the registered trademark, LOVE IS FOREVER ®.

Grounds of this Petition for Cancellation is Abandonment.

But I have never abandoned my registered trademark, LOVE IS FOREVER ® and I will never abandon.

Defendant/registrant/I have been continuing to prepare the business for the products with the registered trademark, LOVE IS FOREVER ® step by step as a tortoise although being encountering INJUSTICE as the OBSTRUCTION OF BUSINESS, MOTION TO STRIKE etc done by you, Mr. Milord A. Keshishian, the assigned attorney for the plaintiff, which I will mention hypothetically.

I will use Internet shop to sell the products with the registered trademark, LOVE IS FOREVER ®. And I have been starting to do marketing research regarding the image of the trademark, LOVE IS FOREVER, November 23 and 24, 2008 firstly.

And since then continuing to prepare the products with the trademark, LOVE IS FOREVER ®, although I have been continuously OBSTRUCTED the preparation around/since 2012 or so by the unwelcome homepages mainly of legal offices, which, it seems, visiting the data base of USPTO, noticing and using my registered trademark, LOVE IS FOREVER ® etc without my OK for, it seems, their office advertisement.

And now OBSTRUCTION by the petition to cancel the registered trademark, LOVE IS FOREVER ®, 92058656, since February 07, 2014, including this petition to cancel the registered trademark, LOVE IS FOREVER ®, 92060328, since November 05, 2014, etc.

The motive of the Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be based on INJUSTICE, I feel hypothetically.

That is, the plaintiff seems to be happy to obtain a seat in a train/theater/restaurant etc which has been used by a firstcomer, or obtain right of ownership of goods or the trademark without consent of the owner etc, I feel hypothetically.

For selling and buying goods/property, for movement of right of ownership of goods/property without consent of the owner, we should not abuse/use the TRADEMARK LAW, CANCELLATION SYSTEM, MOTION TO STRIKE SYSTEM, etc I feel.

To obtain things etc of others/strangers/3rd parties without reporting/having the consent of others/strangers/3rd parties is no good and should be refrained, which even an INFANT knows, I think. **And an INFANT will angry if you, Mr. Milord A. Keshishian, taking away a cookie the INFANT is going to eat, I think.**

Or how do you respond if someone will do same sort of thing to you?

Plaintiff assertion 3:

I. ARGUMENT

On November 14, 2014, Petitioner filed its Petition for Cancellation of the LOVE IS FOREVER registration for “key rings of precious metal; ornaments, namely, earrings, precious metal insignias, precious metal badges, precious meta medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links; clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks” in International Class 14. Petitioner's claim for relief, in 12 numbered paragraphs, is based upon Registrant's failure to use the LOVE IS FOREVER mark in commerce, or that it completely ceased use of the mark, in connection with goods identified in the Registration for a period of at least 3 consecutive years. Further, Petitioner has been damaged and will continue to be damaged if the Registered Mark is permitted to remain on the Principal Register because the Registered Mark stands as a bar to Petitioner's ability to federally register and protect its LOVE IS FOREVER mark for its jewelry goods. *See* Petition for Cancellation, Dkt. No. 1.

Response 3 for the above Plaintiff assertion 3:

Defendant/I will deny the above Plaintiff assertion 3 as follows.

The above Plaintiff assertion 3 including the above Plaintiff assertion 1 etc and the following assertions as 4 to 8 etc will never provide the reasons etc that the Plaintiff is OK to do things/matters against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, I think.

Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, which we should/must not do, I think hypothetically.

If so, if this MOTION TO STRIKE including PETITION TO

CANCEL, 92060328, to be withdrawn or disregarded, I am happy.

Defendant/I am happy to be in accordance with **JUSTICE, FACTS/TRUTH**, etc, and defendant/I am to be happy if customers are to be happy/satisfied with its/my products with the registered trademark, LOVE IS FOREVER ®.

Grounds of this Petition for Cancellation is Abandonment.

But I have never abandoned my registered trademark, LOVE IS FOREVER ® and I will never abandon.

Defendant/registrant/I have been continuing to prepare the business for the products with the registered trademark, LOVE IS FOREVER ® step by step as a tortoise although being encountering INJUSTICE as the OBSTRUCTION OF BUSINESS, MOTION TO STRIKE etc done by you, Mr. Milord A. Keshishian, the assigned attorney for the plaintiff, which I will mention hypothetically.

I will use Internet shop to sell the products with the registered trademark, LOVE IS FOREVER ®. And I have been starting to do marketing research regarding the image of the trademark, LOVE IS FOREVER, November 23 and 24, 2008 firstly.

And since then continuing to prepare the products with the trademark, LOVE IS FOREVER ®, although I have been continuously OBSTRUCTED the preparation around/since 2012 or so by the unwelcome homepages mainly of legal offices, which, it seems, visiting the data base of USPTO, noticing and using my registered trademark, LOVE IS FOREVER ® etc without my OK for, it seems, their office advertisement.

And now OBSTRUCTION by the petition to cancel the registered trademark, LOVE IS FOREVER ®, 92058656, since February 07, 2014, including this petition to cancel the registered trademark, LOVE IS FOREVER ®, 92060328, since November 05, 2014, etc.

The motive of the Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be based on INJUSTICE, I feel hypothetically.

That is, the plaintiff seems to be happy to obtain a seat in a train/theater/restaurant etc which has been used by a firstcomer, or obtain right of ownership of goods or the trademark without consent of the owner etc, I feel hypothetically.

For selling and buying goods/property, for movement of right of ownership of

goods/property without consent of the owner, we should not abuse/use the TRADEMARK LAW, CANCELLATION SYSTEM, MOTION TO STRIKE SYSTEM, etc I feel.

To obtain things etc of others/strangers/3rd parties without reporting/having the consent of others/strangers/3rd parties is no good and should be refrained, which even an INFANT knows, I think. **And an INFANT will angry if you, Mr. Milord A. Keshishian, taking away a cookie the INFANT is going to eat, I think.**

Or how do you respond if someone will do same sort of thing to you?

Regarding the words of "Petitioner's claim for relief, in 12 numbered paragraphs, is based upon Registrant's failure to use the LOVE IS FOREVER mark in commerce, or that it completely ceased use of the mark, in connection with the goods identified in the Registration for a period of at least 3 consecutive years," in the above, I have reported/explained in the Defendant's Pretrial disclosures dated January 26, 2015 etc of 92058656 too, which if you could kindly confirm, I am happy.

Plaintiff assertion 4:

On February 13, 2015, Respondent, appearing pro se, served an untitled document by mail that purports to be an "Answer." On March 3, 2015, Respondent electronically filed an Amended Answer. These documents are "answers" in name only because they do not permit Petitioner to determine which of its allegations are admitted or denied, or what claims are at issue. For the reasons set forth below, the purported answers should be stricken and Applicant should be required to file an answer that conforms to the requirements of the Federal Rules of Civil Procedure.

Response 4 to the above Plaintiff assertion 4:

Defendant/I will deny the above Plaintiff assertion 4 as follows.

The above Plaintiff assertion 4 including the above Plaintiff assertions 1 etc and the following assertions as 5 to 8 etc will never provide the reasons etc that the Plaintiff is OK to do things/matters against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, I think.

Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, which we should/must not do, I think hypothetically.

If so, if this MOTION TO STRIKE including PETITION TO CANCEL, 92060328, to be withdrawn or disregarded, I am happy.

Defendant/I am happy to be in accordance with **JUSTICE, FACTS/TRUTH**, etc, and defendant/I am to be happy if customers are to be happy/satisfied with its/my products with the registered trademark, LOVE IS FOREVER ®.

Grounds of this Petition for Cancellation is Abandonment.

But I have never abandoned my registered trademark, LOVE IS FOREVER ® and I will never abandon.

Defendant/registrant/I have been continuing to prepare the business for the products with the registered trademark, LOVE IS FOREVER ® step by step as a tortoise although being encountering INJUSTICE as the OBSTRUCTION OF BUSINESS, MOTION TO STRIKE etc done by you, Mr. Milord A. Keshishian, the assigned attorney for the plaintiff, which I will mention hypothetically.

I will use Internet shop to sell the products with the registered trademark, LOVE IS FOREVER ®. And I have been starting to do marketing research regarding the image of the trademark, LOVE IS FOREVER, November 23 and 24, 2008 firstly.

And since then continuing to prepare the products with the trademark, LOVE IS FOREVER ®, although I have been continuously OBSTRUCTED the preparation around/since 2012 or so by the unwelcome homepages mainly of legal offices, which, it seems, visiting the data base of USPTO, noticing and using my registered trademark, LOVE IS FOREVER ® etc without my OK for, it seems, their office advertisement.

And now OBSTRUCTION by the petition to cancel the registered trademark, LOVE IS FOREVER ®, 92058656, since February 07, 2014, including this petition to cancel the registered trademark, LOVE IS FOREVER ®, 92060328, since November 05, 2014, etc.

The motive of the Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be based on INJUSTICE, I feel hypothetically.

That is, the plaintiff seems to be happy to obtain a seat in a train/theater/restaurant etc which has been used by a firstcomer, or obtain right of ownership of goods or the trademark without consent of the owner etc, I feel hypothetically.

For selling and buying goods/property, for movement of right of ownership of goods/property without consent of the owner, we should not abuse/use the TRADEMARK LAW, CANCELLATION SYSTEM, MOTION TO STRIKE SYSTEM, etc I feel.

To obtain things etc of others/strangers/3rd parties without reporting/having the consent of others/strangers/3rd parties is no good and should be refrained, which even an INFANT knows, I think. And an INFANT will angry if you, Mr. Milord A. Keshishian, taking away a cookie the INFANT is going to eat, I think.

Or how do you respond if someone will do same sort of thing to you?

Plaintiff assertion 5:

A. APPLICANT'S PURPORTED ANSWERS SHOULD BE STRICKEN

Rule 8(b) of the Federal Rules of Civil Procedure provides in pertinent part as follows:

“A party shall state in short and plain terms the party's defenses to each claim asserted and shall admit or deny the averments upon which the adverse party relies. If a party is without knowledge or information sufficient to form a belief as to the truth of an averment, the party shall so state and this has the effect of a denial. Denials shall fairly meet the substance of the averments denied. When a pleader intends in good faith to deny only a part or a qualification of an averment, the pleader shall specify so much of it as is true and material and shall deny only the remainder.”

Response 5 for the above Plaintiff assertion 5:

Defendant/I will deny the above Plaintiff assertion 5 as follows.

The above Plaintiff assertion 5 including the above Plaintiff assertion 1 etc and the following assertions as 6 to 8 etc will never provide the reasons etc that the Plaintiff is OK to do things/matters against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, I think.

Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, which we should/must not do, I think hypothetically.

If so, if this MOTION TO STRIKE including PETITION TO CANCEL, 92060328, to be withdrawn or disregarded, I am happy.

Defendant/I am happy to be in accordance with **JUSTICE, FACTS/TRUTH**, etc, and defendant/I am to be happy if customers are to be happy/satisfied with its/my products with the registered trademark, LOVE IS FOREVER ®.

Grounds of this Petition for Cancellation is Abandonment.

But I have never abandoned my registered trademark, LOVE IS FOREVER ® and I will never abandon.

Defendant/registrant/I have been continuing to prepare the business for the products with the registered trademark, LOVE IS FOREVER ® step by step as a tortoise although being encountering INJUSTICE as the OBSTRUCTION OF BUSINESS, MOTION TO STRIKE etc done by you, Mr. Milord A. Keshishian, the assigned attorney for the plaintiff, which I will mention hypothetically.

I will use Internet shop to sell the products with the registered trademark, LOVE IS FOREVER ®. And I have been starting to do marketing research regarding the image of the trademark, LOVE IS FOREVER, November 23 and 24, 2008 firstly.

And since then continuing to prepare the products with the trademark, LOVE IS FOREVER ®, although I have been continuously OBSTRUCTED the preparation around/since 2012 or so by the unwelcome homepages mainly of legal offices, which, it seems, visiting the data base of USPTO, noticing and using my registered trademark, LOVE IS FOREVER ® etc without my OK for, it seems, their office advertisement.

And now OBSTRUCTION by the petition to cancel the registered trademark, LOVE IS FOREVER ®, 92058656, since February 07, 2014, including this petition to cancel the registered trademark, LOVE IS FOREVER ®, 92060328, since November 05, 2014, etc.

The motive of the Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be based on INJUSTICE, I feel hypothetically.

That is, the plaintiff seems to be happy to obtain a seat in a train/theater/restaurant etc which has been used by a firstcomer, or obtain right of ownership of goods or the trademark without consent of the owner etc, I feel hypothetically.

For selling and buying goods/property, for movement of right of ownership of goods/property without consent of the owner, we should not abuse/use the TRADEMARK LAW, CANCELLATION SYSTEM, MOTION TO STRIKE SYSTEM, etc I feel.

To obtain things etc of others/strangers/3rd parties without reporting/having the consent of others/strangers/3rd parties is no good and should be refrained, which even an INFANT knows, I think. And an INFANT will angry if you, Mr. Milord A. Keshishian, taking away a cookie the INFANT is going to eat, I think.

Or how do you respond if someone will do same sort of thing to you?

Plaintiff assertion 6:

Fed. R. Civ. P. 8(b).

Under Rule 8(b), an applicant's answer must be directly responsive to the Petition for Cancellation; it should not merely contain arguments in the nature of a brief. *See Thrifty Corporation v. Bomax Enterprises*, 228 USPQ 62,63(TTAB 1985)(requiring Applicant to refile its answer to Opposer's notice of opposition because Applicant's filing lacked a specific response to each averment in the notice of opposition and was “basically argumentative rather than a proper responsive pleading to the notice of opposition”). The Respondent clearly did not meet this standard because as each paragraph of the “Answer” contains bare and conclusory assertion or arguments. Further, the “Answer ” does not contain specific responses to each of the averments in Opposer's Petition for Cancellation, but instead contains a confusing recitation of events that may or may not have occurred and “hypothetical” argument of “obstruction of business” in an attempt to convince the Board why the registration should not be cancelled. These bald assertions do not provide Petitioner or the Board with fair notice of whether Respondent admits or denies the allegations, nor does not plead the elements necessary to establish the affirmative defenses. As such, these assertions and “defenses” are not properly pleaded as an answer and affirmative defenses, not sufficiently founded on rules or case law, and should be stricken.

Response 6 for the above Plaintiff assertion 6:

Defendant/I will deny the above Plaintiff assertion 6 as follows and there seems to be no rule etc to be able to deny hypothetical assertion/argument etc, I think.

The above Plaintiff assertion 6 including the above Plaintiff assertion 1 etc and the

following assertions as 7 to 8 etc will never provide the reasons etc that the Plaintiff is OK to do things/matters against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, I think.

Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, which we should/must not do, I think hypothetically.

If so, if this MOTION TO STRIKE including PETITION TO CANCEL, 92060328, to be withdrawn or disregarded, I am happy.

Defendant/I am happy to be in accordance with JUSTICE, FACTS/TRUTH, etc, and defendant/I am to be happy if customers are to be happy/satisfied with its/my products with the registered trademark, LOVE IS FOREVER ®.

Grounds of this Petition for Cancellation is Abandonment.

But I have never abandoned my registered trademark, LOVE IS FOREVER ® and I will never abandon.

Defendant/registrant/I have been continuing to prepare the business for the products with the registered trademark, LOVE IS FOREVER ® step by step as a tortoise although being encountering INJUSTICE as the OBSTRUCTION OF BUSINESS, MOTION TO STRIKE etc done by you, Mr. Milord A. Keshishian, the assigned attorney for the plaintiff, which I will mention hypothetically.

I will use Internet shop to sell the products with the registered trademark, LOVE IS FOREVER ®. And I have been starting to do marketing research regarding the image of the trademark, LOVE IS FOREVER, November 23 and 24, 2008 firstly.

And since then continuing to prepare the products with the trademark, LOVE IS FOREVER ®, although I have been continuously OBSTRUCTED the preparation around/since 2012 or so by the unwelcome homepages mainly of legal offices, which, it seems, visiting the data base of USPTO, noticing and using my registered trademark, LOVE IS FOREVER ® etc without my OK for, it seems, their office advertisement.

And now OBSTRUCTION by the petition to cancel the registered trademark, LOVE IS FOREVER ®, 92058656, since February 07, 2014, including this petition to cancel the registered trademark, LOVE IS FOREVER ®, 92060328, since November 05, 2014, etc.

The motive of the Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be based on INJUSTICE, I feel hypothetically.

That is, the plaintiff seems to be happy to obtain a seat in a train/theater/restaurant etc which has been used by a firstcomer, or obtain right of ownership of goods or the trademark without consent of the owner etc, I feel hypothetically.

For selling and buying goods/property, for movement of right of ownership of goods/property without consent of the owner, we should not abuse/use the TRADEMARK LAW, CANCELLATION SYSTEM, MOTION TO STRIKE SYSTEM, etc I feel.

To obtain things etc of others/strangers/3rd parties without reporting/having the consent of others/strangers/3rd parties is no good and should be refrained, which even an INFANT knows, I think. And an INFANT will angry if you, Mr. Milord A. Keshishian, taking away a cookie the INFANT is going to eat, I think.

Or how do you respond if someone will do same sort of thing to you?

Plaintiff assertion 7:

A respondent is allowed to amend its answer once as a matter of course within twenty-one days after serving it. Fed. R. Civ. P. 15(a); TBMP § 507. Respondent's March 3, 2015 amended "Answer" is incomplete because it did not include a single, complete version of the intended amended answer. Instead, Respondent amended and served only amended pages 1, 7, 16, 29, and 34 of the original "answer." Since Respondent's March 3, 2015 amended "Answer" is incomplete, it should be stricken.

Response 7 for the above Plaintiff assertion 7:

Defendant/I will deny the above Plaintiff assertion 7.

The above Plaintiff assertion 7 including the above Plaintiff assertion 1 etc and the following assertions as 8 etc will never provide the reasons etc that the Plaintiff is OK to do things/matters against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, I think.

Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc

seem to be against **JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc**, which we should/must not do, I think hypothetically.

If so, if this MOTION TO STRIKE including PETITION TO CANCEL, 92060328, to be withdrawn or disregarded, I am happy.

Defendant/I am happy to be in accordance with **JUSTICE, FACTS/TRUTH**, etc, and defendant/I am to be happy if customers are to be happy/satisfied with its/my products with the registered trademark, **LOVE IS FOREVER ®**.

Grounds of this Petition for Cancellation is Abandonment.

But I have never abandoned my registered trademark, **LOVE IS FOREVER ®** and I will never abandon.

Defendant/registrant/I have been continuing to prepare the business for the products with the registered trademark, **LOVE IS FOREVER ®** step by step as a tortoise although being encountering **INJUSTICE** as the **OBSTRUCTION OF BUSINESS, MOTION TO STRIKE** etc done by you, Mr. Milord A. Keshishian, the assigned attorney for the plaintiff, which I will mention hypothetically.

I will use Internet shop to sell the products with the registered trademark, **LOVE IS FOREVER ®**. And I have been starting to do marketing research regarding the image of the trademark, **LOVE IS FOREVER**, November 23 and 24, 2008 firstly.

And since then continuing to prepare the products with the trademark, **LOVE IS FOREVER ®**, although I have been continuously **OBSTRUCTED** the preparation around/since 2012 or so by the unwelcome homepages mainly of legal offices, which, it seems, visiting the data base of USPTO, noticing and using my registered trademark, **LOVE IS FOREVER ®** etc without my OK for, it seems, their office advertisement.

And now **OBSTRUCTION** by the petition to cancel the registered trademark, **LOVE IS FOREVER ®**, 92058656, since February 07, 2014, including this petition to cancel the registered trademark, **LOVE IS FOREVER ®**, 92060328, since November 05, 2014, etc.

The motive of the Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be based on INJUSTICE, I feel hypothetically.

That is, the plaintiff seems to be happy to obtain a seat in a train/theater/restaurant etc

which has been used by a firstcomer, or obtain right of ownership of goods or the trademark without consent of the owner etc, I feel hypothetically.

For selling and buying goods/property, for movement of right of ownership of goods/property without consent of the owner, we should not abuse/use the TRADEMARK LAW, CANCELLATION SYSTEM, MOTION TO STRIKE SYSTEM, etc I feel.

To obtain things etc of others/strangers/3rd parties without reporting/having the consent of others/strangers/3rd parties is no good and should be refrained, which even an INFANT knows, I think. **And an INFANT will angry if you, Mr. Milord A. Keshishian, taking away a cookie the INFANT is going to eat, I think.**

Or how do you respond if someone will do same sort of thing to you?

Plaintiff assertion 8:

As set forth above, Respondent's purported answer is ambiguous, unintelligible, uncertain, legally insufficient and/or improper. Therefore, it is appropriate for it to be stricken, prior to the parties expending their time, and the Board's time, on unnecessary discovery, testimony, argument and briefing. Applicant should be ordered to file an answer that is in proper form and conforms to the requirements of Rule 8(b), and that is properly served upon Petitioner's counsel.

Response 8 for the above Plaintiff assertion 8:

Thank you very much for your advice. I would like to keep learning/studying regarding how to write to prepare documents.

Respecting the words of the attorney, on March 09, 2015 or so regarding the style/manner of sentence of my ANSWER presented/mailed 02/13/2015 for TTAB and Amendments presented/mailed 03/03/2015 for TTAB, I requesting respectfully/thankfully advice of TM information specialist of 571-272-8500 of TTAB, I received the words, No Problem. I have been relieved now.

The above Plaintiff assertion 8 including the above Plaintiff assertion 1 to 7 etc will never provide the reasons etc that Plaintiff is OK to do things/matters against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, I think.

Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be against JUSTICE, Common Sense, Public Order and Morals, First Come First Served Rule etc, which we should/must not do, I think hypothetically.

If so, if this MOTION TO STRIKE including PETITION TO CANCEL, 92060328, to be withdrawn or disregarded, I am happy.

Defendant/I am happy to be in accordance with **JUSTICE, FACTS/TRUTH**, etc, and defendant/I am to be happy if customers are to be happy/satisfied with its/my products with the registered trademark, LOVE IS FOREVER ®.

Grounds of this Petition for Cancellation is Abandonment.

But I have never abandoned my registered trademark, LOVE IS FOREVER ® and I will never abandon.

Defendant/registrant/I have been continuing to prepare the business for the products with the registered trademark, LOVE IS FOREVER ® step by step as a tortoise although being encountering INJUSTICE as the OBSTRUCTION OF BUSINESS, MOTION TO STRIKE etc done by you, Mr. Milord A. Keshishian, the assigned attorney for the plaintiff, which I will mention hypothetically.

I will use Internet shop to sell the products with the registered trademark, LOVE IS FOREVER ®. And I have been starting to do marketing research regarding the image of the trademark, LOVE IS FOREVER, November 23 and 24, 2008 firstly.

And since then continuing to prepare the products with the trademark, LOVE IS FOREVER ®, although I have been continuously OBSTRUCTED the preparation around/since 2012 or so by the unwelcome homepages mainly of legal offices, which, it seems, visiting the data base of USPTO, noticing and using my registered trademark, LOVE IS FOREVER ® etc without my OK for, it seems, their office advertisement.

And now OBSTRUCTION by the petition to cancel the registered trademark, LOVE IS FOREVER ®, 92058656, since February 07, 2014, including this petition to cancel the registered trademark, LOVE IS FOREVER ®, 92060328, since November 05, 2014, etc.

The motive of the Plaintiff's/PETITIONER'S Petition for Cancellation, MOTION TO STRIKE etc seem to be based on INJUSTICE, I feel hypothetically.

That is, the plaintiff seems to be happy to obtain a seat in a train/theater/restaurant etc which has been used by a firstcomer, or obtain right of ownership of goods or the trademark without consent of the owner etc, I feel hypothetically.

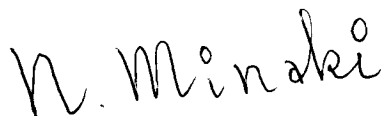
For selling and buying goods/property, for movement of right of ownership of goods/property without consent of the owner, we should not abuse/use the TRADEMARK LAW, CANCELLATION SYSTEM, MOTION TO STRIKE SYSTEM, etc I feel.

To obtain things etc of others/strangers/3rd parties without reporting/having the consent of others/strangers/3rd parties is no good and should be refrained, which even an INFANT knows, I think. **And an INFANT will angry if you, Mr. Milord A. Keshishian, taking away a cookie the INFANT is going to eat, I think.**

Or how do you respond if someone will do same sort of thing to you?

Regarding the PETITIONER'S MOTION TO STRIKE including the PETITION TO CANCEL, 92060328, due to the facts/reasons etc being as petitioned and reported as in the above, I sincerely petition the high judgment of Trademark Trial and Appeal Board.

Very truly sincerely yours,



Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki(Mr.)

Representative Director

Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

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